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VICTOR M. BROWN



Respectfully Submitted

The undersigned writes the Court to respectfully request an enlargement of time to respond to US Defendant's Rule 12(b) Motion to Dismiss for lack of Subject Matter Jurisdiction or in the alternative for change of venue to the District of Vermont under the Principles of *Forum Non Conveniens*. Plaintiff's original response date to the Defendant's motion was August 29, 2014 and the case is scheduled for oral argument on September 5, 2014 at 2:00 p.m. Plaintiff requests an enlargement of time for a written response until September 4, 2014. The undersigned spoke with Assistant US Attorney Orelia Merchant on September 4, 2014, but did not request that the US Defendants consent to this request for an enlargement of time, due in part to the undersigned's stated intent that Plaintiff will consent to Point III of Defendant's motion that the case be transferred to the District of Vermont for all purposes. This letter is

Dear Judge Gleeson,

Re: Oliver v. The United States of America, et al
13 CV 5497 (JG)(RML)

The United States Courthouse for the Eastern District of New York
The Chambers of U.S. District Judge John Gleeson
225 Cadman Plaza East
Brooklyn, NY 11201

September 4, 2014

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